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THURSTON COUNTY DEPARTMENT OF COMMUNICATIONS
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**BEFORE THE
Federal Communications Commission**

Washington, D.C. 20554

In the Matter of

Revision of the)	CC Docket No. 94-102
Commission's Rules to ensure)	
compatibility with Enhanced 9-1-1)	RM-8143
emergency calling systems)	

To: The Commission

INTRODUCTION:

The Thurston County Department of Communications is a county-wide Enhanced 9-1-1 Public Safety Answering Point, and provides dispatch services to 6 law enforcement agencies, 17 fire departments/districts and a county-wide Emergency Medical System. We serve a population of 186,000 citizens over 750 square miles, which includes the State Capitol City of Olympia. We have operated in a consolidated configuration for 23 years and began offering Basic 9-1-1 to our citizen in 1978. We upgraded our system to Enhanced 9-1-1 in 1987.

Being in the State Capitol city we experience a large number of PBX system calls to 9-1-1, most of which do not provide an accurate callback number or location. We saw the beginning of Cellular calls grow from 1 or 2 per month to over 1,200 per month in 1993. Approximately 55% of cellular callers can not give an accurate location which requires we spend 3 times the amount of time spent on a wireline 9-1-1 call to determine the location of the emergency.

POSITION:

We believe this proposed rule making is extremely important to preserve the public's safety and well-being throughout the United States. It proposes to do so by ensuring that existing and emerging mobile wireless technologies that interact with the public switched network, PBX and dispersed private telephone

systems be compatible with Enhanced 9-1-1. It prevents the undermining of the public's access to emergency assistance.

Of particular importance is Enhanced 9-1-1 compatibility for both Cellular and PCS technologies. Cellular providers in the State of Washington are required by law to pass automatic number identification ALI or callback numbers to 9-1-1 answering points as of January 1, 1995, showing that technology is not a limiting factor in this area. As such, we believe a one year time frame for requiring this feature is not at all unreasonable. As for location identification, a 2 year time frame would be more appropriate to allow a uniform provision, with or without handset modifications.

We support requiring Enhanced 9-1-1 compatibility for PBX and dispersed telephone systems through attainable technical standards that include Station Number Identification (SNI), the callers location and callback number.

Recognizing the importance of including the public's welfare in future research and development rather than continually going back after the fact to ensure these lifesaving features become incorporated saves time and money.

Adoption of these proposed rules demonstrate a governmental/private cooperative effort toward being pro-active rather than re-active in the public's interest.

We are very concerned about the effects on Enhanced 9-1-1 systems such as ours, of wireless communications and their introduction of competition in the local loop. It is also apparent that advances in the telephone network towards common channel signaling and advanced intelligent network architectures have not included Enhanced 9-1-1 systems.

While we generally support reduced regulation, we believe this is an area where increased competition will not benefit the citizens of the United States. Therefore we strongly support the APCO/NENA/NASNA position regarding these issues. We also strongly support the positions taken at the TIA/PICA/APCO/NENA/NASNA Wireless and Emergency Services Joint Experts Meeting held in October, 1994, which we believe are in agreement with the APCO/NENA/NASNA position.

The Commission should rule decisively to set the tone that the communications industries need to consider the effects of their designs and products on Enhanced 9-1-1 systems throughout the United States. The service providers, equipment and system suppliers should be required to work with public safety associations to this end, for after all they will be the ones that will answer the emergency calls to 9-1-1 for help from family and friends when they are in need.

Comment Date: January 9, 1995

Respectfully submitted,
Thurston County Department of
Communications



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County-wide Enhanced 9-1-1 Public
Safety Dispatch Department

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